



American Public Health Association

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February 11, 2000

To: USDA Docket Office, Docket #98-045N
USDA/FSIS Hearing Clerk
300 12th St., SW, Rm. 102 Cotton Annex
Washington, DC 20250-3700

Re: President's Council on Food Safety Strategic Plan

Contact: Don Hoppert, 202-777-25 14, donald.hoppert@apha.org

Comments of the American Public Health Association

Introduction

The American Public Health Association (APHA), representing over 50,000 public health professionals dedicated to advancing the nation's health, including many of the front-line workers whose everyday efforts are essential to ensuring food safety, is pleased to submit comments on the President's Council on Food Safety's Food Safety Strategic Plan.

At its annual meeting in November, 1999, APHA adopted policy supporting the creation of a single independent food safety agency. APHA believes the creation of a single agency will significantly improve our federal food safety system, and close many of the gaps that currently exist.

In 1998, President Clinton signed an executive order creating the President's Council on Food Safety to improve the nation's food safety infrastructure. This initiative examines what steps federal agencies, including the Environmental Protection Agency, Food and Drug Administration and Department of Agriculture can take to protect consumers and ensure a seamless and protective food safety system.

APHA believes that the President's Council on Food Safety identifies a variety of areas within the federal food safety system in which improvements can be made.

Need for a Single Federal Food Safety Agency

APHA appreciates the administration's efforts to identify gaps in the nation's food safety system. We are, however, disappointed that the serious consideration is not given to the

establishment of a single federal public health agency to oversee the safety of the U.S. food supply. Because the Council does not recommend the establishment of a single food safety agency, APHA believes that several problems that occur in the current system will remain unresolved. These problems include failing to streamline decision-making; failing to eliminate discrepancies in how individual agencies inspect food; inadequate inspections for facilities; and a lack of oversight of imported foods.

APHA strongly supports the creation of a single federal public health agency with inspection and enforcement authority for the safety of the U.S. food supply. We believe the U.S. government's ability to assure a safe food supply is compromised by the fact that authority for food safety is currently divided among several federal agencies, and the legal authority and resources which these agencies have for both domestic and imported food sources is inadequate. This single federal agency should be provided with sufficient scientific and enforcement resources to include food safety inspections (using performance-based standards) to monitor effectively and to assure the safety of the U.S. food supply.

To achieve this goal, it is essential that the U.S. government significantly strengthen the laws and regulations that govern the safety of both our imported and domestic food supplies. Specifically, these laws and regulations should be harmonized to provide oversight that ensures the safety of domestic food production and the safety of imported food and contains an adequate system of penalties to ensure compliance.

APHA believes that a streamlined food safety system will also produce a streamlined oversight role for Congress. APHA believes that congressional oversight could be consolidated with the creation of a single food safety agency, and should be placed within the jurisdiction of committees with oversight and authority over the U.S. public health system.

Currently, twelve different federal agencies administer 35 laws that regulate our food safety system. Due to this fractured structure, the U.S. General Accounting Office (GAO) has issued several reports and testimonies in support of a single food safety agency. According to GAO, the most effective solution to the current problems within the U.S. food safety system, is the creation of a single food safety agency with uniform authority¹

APHA believes the Council is missing an important opportunity by not moving recommendations for the creation of an independent food safety agency forward.

Need for More Research and Increased Resources

APHA supports increased research efforts to identify better and more effective ways of assuring the safety of food intended for human consumption should be coordinated and expanded with increased funding support from the federal government.

¹ Food Safety: U.S. Needs a Single Agency to Administer a Unified, Risk-Based Inspection System (GAO)/T-RCED-99-256, August 4, 1999).


According to the Centers for Disease Control and Prevention and (CDC) Council on Agricultural Science and Technology, 16 to 33 million cases of foodborne illness occur each year in the United States with as many as 9,100 deaths. Costs for those illnesses and deaths in medical treatment and lost productivity range from \$6.6 to \$37.1 billion each year. The uncertainty in those figures results from the fact that we as a nation do not know just how many cases of foodborne illness go unreported each year.

The great uncertainty in current estimates of foodborne illness in the United States are indicative of other problems our country faces in identifying, tracking, and responding to emerging infectious diseases. To date, we have not invested the resources necessary to develop surveillance networks that can efficiently and expeditiously identify and characterize emerging pathogens. In terms of combating foodborne illness and making sure resources are allocated where they are most needed, it is vital that Congress appropriate the necessary funds to build the Nation's emerging infectious disease surveillance and response networks such as FoodNet. We need to be thinking not just about the pathogens we know today to be a problem, we also need to be able to detect pathogens that may emerge or reemerge tomorrow.

Conclusion

While APHA supports the premise and many of the goals of the President's Food Safety Council, we are disappointed the draft plan fails to address the need for a single federal food safety agency. This is especially troubling given the support for this effort within the GAO, in Congress, and among numerous public health and consumer advocacy organizations. We urge you to reconsider including this recommendation in the final draft of the food safety strategic plan.

Sincerely,



Mohammad N. Akhter, MD, MPH
Executive Director

Medicare because of disability or end stage renal disease, as for those who qualify on the basis of age.

References

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9907: Ensuring the Safety of the Food Supply in the United States

The American Public Health Association,

Recognizing that foods consumed by the population of the United States should be safe and wholesome; and

Recognizing that APHA has long advocated for protection of the food supply (including Policy #9303 that called for a federal "public health agency that has policy responsibility for meat, poultry and seafood safety;" and

Recognizing that a substantial portion of the food currently consumed in the United States is imported, and that the proportion of imported food in the United States is increasing;^{1,2} and

Recognizing that imported foods have been associated with several major outbreaks of food-borne illnesses in recent years;³ and

Recognizing that a wide variety of foods produced in the United States have also been associated with recent food-borne illness outbreaks;⁴⁻⁷ and

Recognizing that many of the recent food-borne illnesses in the United States are

associated with emerging infectious diseases;¹² and

Recognizing that there are an estimated 16-33 million cases of food-borne illness in the United States each year with up to 9,100 deaths," with an annual cost for health care and for lost productivity from these illnesses from \$6.6 to \$22 billion each year;¹⁴ and

Recognizing that some 600 pesticides are in use on food in the US and that the APHA has previously supported enactment and implementation of the Food Quality Protection Act; and

Recognizing that the global and rigorous application of public health principles in preventing food-borne illnesses and in controlling their spread would greatly improve the safety of the United States food supply; and

Recognizing that the ability of the United States government to help assure a safe food supply is compromised by the fact that authority for food safety is currently divided among some federal agencies, and that the legal authority which these agencies have over both domestic and foreign food sources is very limited, and that their resources for food safety assurance are also very limited;^{15,16}

Recognizing that federal food protection programs and activities support the efforts of state and local agencies that have primary responsibility for the safety of foods consumed within their jurisdictions; therefore

1. Recommends that all federal inspection and enforcement authority for the safety of the US food supply be coordinated through a single public health authority;

2. Recommends that the agency should be provided with sufficient scientific and enforcement resources to include food safety inspections (using performance-based standards) to monitor effectively and to assure the safety of the US food supply;

3. Recommends that the laws and regulations covering the safety of the US food supply should be significantly strengthened and harmonized to provide effective oversight that ensures the safety of domestic food production and the safety of imported food and contains an adequate system of penalties to ensure compliance; and

4. Recommends that research efforts designed to find better ways of assuring the safety of food intended for human consumption should be coordinated and expanded with increased funding support from the federal government and other sources.

References

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